

~~COMMENT SHEET~~

STAT TO:
Office of Congressional Affairs

STAT FROM: Compensation, Automation, and Planning

SUBJECT: H.R. 2852, Federal Employee Family-Building Act of 1987

Subject bill has been reviewed by the Office of Personnel and our position is as follows:

- ☐ No objection.
- ☐ Continue monitoring/OP interest.
- ☒ No CIA equities.
- ☐ Seek CIA exemption.
- ☐ Advise OP when enacted.
- ☒ Comments.

This bill provides that any carrier offering obstetrical benefits under FEHBP also shall provide benefits for "family-building procedures," defined as (1) procedures to overcome infertility, including procedures to achieve pregnancy and to carry pregnancy to term, and (2) procedures relating to child adoption. The bill also makes sick leave available to federal employees for purposes related to family-building procedures.

Although there are no Agency-specific equities, we believe that most of the benefits provided for adoption procedures are inappropriate, especially when they are to be provided under the guise of being health-related. For what other health conditions does health insurance cover such expenses as placement fees, legal fees, counseling fees, transportation expenses, and the equivalent of adoption agency fees and foster-care charges? Second, the granting of sick leave to employees

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undergoing infertility procedures is redundant. They have a valid reason to use sick leave. Therefore, this grant of sick leave is intended solely for those seeking to adopt a child. The use of sick leave for these purposes goes contrary to the intent for which sick leave is available. Employees who take time off to care for a sick child have a stronger argument for being allowed to use sick leave (yet they cannot use it) than an employee who is involved in non-health-related procedures to adopt a child. This is a totally inappropriate grant of the sick leave benefit.

STAT

4 March 1988

Date

Name Signed